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DEPARTMENT OF NATURAL RESOURCES
OFFICE OF THE SECRETARY

December 12, 2005

Donald Silawsky
U. S. Dept of Energy
Office of Petroleum Reserves (FE-47)
1000 Independence Avenue, S. W.
Washington, DC 20585-0301

RE: C20050552, Solicitation of Views
U. S. Dept. of Energy (DOE), Direct Federal Action
Request for Scoping Comments for the Proposed Expansion of the Strategic
Petroleum Reserve (SPR)

Dear Mr. Silawsky:

I have received your letter of November 21, 2005, requesting input regarding issues which should be addressed in the Environmental Impact Statement (EIS) being prepared for the proposed expansion of the Strategic Petroleum Reserve. Review of the scoping document indicates that the proposed expansion is a Direct Federal Action that will require submittal of a Consistency Determination for the Louisiana Coastal Zone *in* accordance with the approved Louisiana Coastal Resources Program (LCRP) as required by Section 307 of the Coastal Zone Management Act of 1972, as amended. Issues of concern to Louisiana that need to be addressed in the EIS and the Consistency Determination are discussed below.

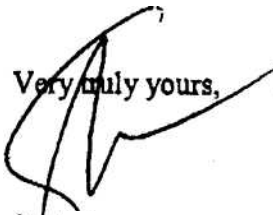
The construction and operation of new or expanded SPR facilities that will adversely affect wetlands within the Louisiana Coastal Zone are a primary concern of the State of Louisiana as we have a "no net loss of wetland" policy in which the applicant must provide compensatory mitigation for any wetland losses resulting from those proposed activities. These include direct impacts from expansion of facilities into wetland areas, such as pipeline routing or facility siting, or indirect or cumulative impacts of the proposed activities on wetlands or wetland resources such as raw water removal from surface water bodies in areas prone to saltwater intrusion, or brine disposal in offshore areas. For sites with proposed brine wells, precaution must be taken to avoid contamination of drinking water aquifers.

Another concern is safety or potential safety hazards resulting from construction or operation of the facilities. There needs to be a spill response plan with provisions for precluding or

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addressing oil or brine spills from pipelines. Also, a thorough geologic and geophysical investigation of the proposed cavern sites needs to be undertaken to identify, address, and make and design provisions for any potential sources of cavern failure or leakage, in order to avoid a repeat of the Week Bay abandonment.

I want to thank you for the opportunity to comment on the proposed expansion of SPR facilities, which are not only of concern to the State of Louisiana, but are of National Energy Policy interest and concern. I look forward to the upcoming EIS on the SPR expansion, and can be reached at [REDACTED] if I can be of assistance in any way on this matter.

Very truly yours,

Scot L. Angelle
Secretary

cc: Governor Kathleen Babineaux Blanco